

CASE NUMBER 1:18-MJ-4205

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

I, Bryon Green, hereafter "Affiant," being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a United States Postal Inspector and have been so employed since October 2006, presently assigned at Cleveland, Ohio to investigate Prohibited Mailing offenses. I have received training in the detection and investigation of prohibited mailing offenses. I have worked U.S. Postal Service related investigations for approximately 11 years, during which time I have been the case agent for investigations leading to prosecution in U. S. District Court, as well as state courts. Over the past two years, I have worked in conjunction with the Homeland Security Investigations (HSI) and the Border Enforcement Security Taskforce (BEST) on cases involving illegal narcotics mailed from foreign countries.

2. As a Postal Inspector, I have also conducted online investigations, analyzed pen register and telephone toll data, analyzed financial records, executed controlled deliveries of controlled substances, interviewed witnesses, drafted and executed search warrants, seized illegal drugs and other evidence of drug violations in physical and electronic sources, processed seized evidence, supervised the purchase of controlled substances by confidential sources, conducted undercover purchases of controlled substances in person and online, and debriefed persons arrested and convicted of drug trafficking offenses regarding their illegal activity.

3. Through investigation and training, I have become familiar with the types and amounts of profits made by drug traffickers and the methods, language, and terms that are used to disguise their illegal activity. I know that persons engaged in drug trafficking require expedient

forms of communication to maintain an adequate and consistent supply of drugs from sources, and to effectively market those drugs to customers.

4. Your Affiant knows based on training and experiences those individuals who traffic in one controlled substances often traffic and possesses other controlled substances and controlled substance analogues, particularly synthetic narcotics.

5. Furthermore, based on my training and experience that individuals who engage in unlawful activity on the internet (including the dark net) sometimes also use the expertise that they learn to engage in other criminal activity online.

6. This Affidavit is offered in support of a Criminal Complaint against Defendant MATTHEW MULFORD charging him with Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances and Money Laundering Conspiracy in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1) and (b)(1)(C), and 846 and Title 18, United States Code, Section 1956(h). As further detailed below, your Affiant submits that there is probable cause to believe that from on or about January 2015 to the present, Defendants, with others known and unknown to law enforcement, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute and possess with the intent to distribute mixtures or substances containing a detectable amount of the following controlled substance analogues, as defined in 21 U.S.C. § 802(32), knowing that the substances were intended for human consumption, as provided in 21 U.S.C. § 813, and controlled substances: Xanax/Alprazolam, Flurazepam, and analogues of the same, all in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1) and (b)(1)(C), and 846. In addition, from January 2015 to the present, Defendant engaged in an ongoing money laundering conspiracy involving

various means, including the use of digital currency to conceal drug trafficking proceeds and promote criminal activity, all in violation of Title 18, United States Code, Section 1956(h).

7. The facts set forth below are based upon your Affiant's personal knowledge learned through the course of the investigation as well as information obtained from law enforcement and additional sources.

8. This Affidavit is being submitted for the limited purpose of informing the court of the evidence establishing probable cause for a violation of federal criminal law. Since this affidavit is for this limited purpose, your Affiant has not included each and every fact known concerning this investigation

BACKGROUND CONCERNING DARK NET AND CRYPTOCURRENCY INVESTIGATIONS

9. The "clear" or "surface" web is part of the internet accessible to anyone with a standard browser and that standard web search engines can index. The deep web is the part of the internet whose contents are not indexed by standard web search engines. The dark net is a part of the deep web that not only cannot be discovered through a traditional search engine, but also has been intentionally hidden and is inaccessible through standard browsers and methods.

10. The dark net is accessible only with specific software, configurations, and/or authorization, including non-standard communications protocols and ports, such as a TOR ("The Onion Router") browser. A TOR browser is designed specifically to facilitate anonymous communication over the internet. In order to access the TOR network, a user must install TOR software either by downloading an add-on to the user's web browser or by downloading the free "TOR browser bundle." Use of the TOR network bounces a user's encrypted communications through a distributed network of relay computers run by volunteers all around the world, thereby masking the user's actual IP address, which could otherwise be used to identify a user. Because

of the way TOR routes communications through other computers, traditional IP identification techniques are not viable. When a user on the TOR network accesses a website, for example, the IP address of a TOR “exit node,” rather than the user’s actual IP address, shows up in the website’s IP log. An exit node is the last computer through which a user’s communications were routed. There is no practical way to trace the user’s actual IP address back through that TOR exit node IP address. A criminal suspect’s use of TOR makes it extremely difficult for law enforcement agents to detect a host, administrator, or user actual IP address or physical location.

11. Dark net marketplaces operate on the dark net. These sites are generally only accessible through the input of specific addresses in a TOR browser. The dark net marketplaces function primarily as black markets, selling or brokering transactions involving drugs, cyber-arms, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, steroids, and other illicit goods as well as the occasional sale of legal products. Dark net vendors (also known as distributors) operate on these dark net markets as sellers of these goods. They provide detailed information about their wares on these sites, including listings of their drugs for sale, contact information (such as TOR-based email or encrypted messaging applications), and the prices and quantities of drugs for sale. Items purchased through dark net vendors are generally paid for in cryptocurrency such as Bitcoin. Cryptocurrency or virtual currency permits the anonymous exchange of unlimited amounts of digital currency to anyone in the world without the use of traditional banks or banking systems. Customers purchase these goods using a computer or smartphone.

12. Your Affiant is aware that some dark net marketplace vendors conduct the entirety of their transactions on the dark web marketplace. Other vendors use the sites as an advertising

base and messaging system and conduct their financial business in peer-to-peer¹ transactions in order to avoid using third party escrow systems that they believe could be subject to law enforcement seizures as well as thefts, hacks, and scams.

13. Bitcoin (BTC)² is a type of virtual currency, circulated over the internet. Bitcoin are not issued by any government, bank, or company, but rather are controlled through computer software operating via a decentralized, peer-to-peer network. Bitcoin is just one of many varieties of virtual currency. Other currency includes Bitcoin Cash (“BCH”), Litecoins (“LTC”), Ethereum (“ETH” or “ether”), and Ripple (XRP). For ease of reference, the analysis below relating to Bitcoin generally applies to other types of cryptocurrencies (often collectively referred to as “Altcoins”).

14. Bitcoin are sent to and received from BTC “addresses.” A Bitcoin address is somewhat analogous to a bank account number and is represented as a 26-to-35-character-long case-sensitive string of letters and numbers. Each Bitcoin address is controlled through the use of a unique corresponding private key. This key is the equivalent of a password, or PIN, and is necessary to access the Bitcoin address. Only the holder of an address’ private key can authorize any transfers of bitcoin from that address to other Bitcoin addresses. Users can operate multiple BTC addresses at any given time and may use a unique Bitcoin address for each and every transaction.

15. To acquire bitcoin, a typical user purchases them from a virtual³ currency exchange. A virtual currency exchange is a business that allows customers to trade virtual currencies for other

¹ A “peer-to-peer” transaction is a direct transaction between two individuals without a third party intermediary.

² Since Bitcoin is both a currency and a protocol, capitalization differs. Accepted practice is to use “Bitcoin” (singular with an uppercase letter B) to label the protocol, software, and community, and “bitcoin” (with a lowercase letter b) to label units of the currency. That practice is adopted here.

³ Bitcoins can accurately be referred to as a virtual, digital, and/or cryptographic currency.

forms of value, such as conventional fiat money (*e.g.*, U.S. dollars, Russian rubles, euros). Exchanges can be brick-and-mortar businesses (exchanging traditional payment methods and virtual currencies) or online businesses (exchanging electronically transferred money and virtual currencies). Virtual currency exchanges doing business in the United States are regulated under the Bank Secrecy Act and must collect identifying information about their customers and verify their clients' identities.

16. To transfer bitcoin to another Bitcoin address, the sender transmits a transaction announcement, which is electronically signed with the sender's private key, across the peer-to-peer BTC network. To complete a transaction, a sender needs only the Bitcoin address of the receiving party and the sender's own private key. This information on its own rarely reflects any identifying information about either sender or recipient. As a result, little-to-no personally identifiable information about the sender or recipient is transmitted in a Bitcoin transaction itself. Once the sender's transaction announcement is verified by the network, the transaction is added to the blockchain, a decentralized public ledger that records every Bitcoin transaction. The blockchain logs every Bitcoin address that has ever received bitcoin and maintains records of every transaction for each Bitcoin address.

17. While a Bitcoin address owner's identity is generally anonymous within the blockchain (unless the owner opts to make information about the owner's Bitcoin address publicly available), investigators can use the blockchain to identify the owner of a particular Bitcoin address. Because the blockchain serves as a searchable public ledger of every Bitcoin transaction, investigators can sometimes trace transactions to third party companies that collect identifying information about their customers and are responsive to legal process.

18. In addition to Bitcoin and other cryptocurrencies, there are also tokens. Like

Bitcoin and Altcoins, tokens use blockchain technology. Tokens are digital assets that are powered through smart contracts. While tokens theoretically can be used to represent any assets that are fungible and tradeable, they are often used as a commodity similar in some ways to stocks or options. In these scenarios, tokens are created and distributed through an Initial Coin Offering (ICO). Through an ICO, a venture offers a stock of specialized crypto tokens for sale with the promise that those tokens will operate as the medium of exchange when accessing services on a digital platform developed by the venture. The sale of tokens provides capital to fund the initial development of the digital platform, although no commitment is made as to the price of future services (in tokens or otherwise). In this sense, tokens are a fungible and potentially highly volatile unit of value that can be easy to obtain. Your affiant is aware that dark net distributors are increasingly using tokens as a means of laundering their illicit gains.

19. Your affiant is aware that individuals conducting business in this manner must use a computer or other electronic device, such as a smartphone, tablet, or computer to conduct transactions involving bitcoin. Users of bitcoin must establish electronic wallets to receive and send the bitcoin during these transactions. These wallets are electronic in nature and may be stored on mobile devices (phones or tablets), external or removable media, or computers. They may also be stored on third party wallet providers (such as Armory). Individuals often associate email accounts with these wallet providers and store information relating to that wallet on their email account. Your affiant is also aware that individuals conducting business by bitcoin can back-up wallets to paper printouts that would contain information to restore the wallet in an electronic form (cold storage). Passwords for access to electronic wallets are typically complex and are often written down or saved in an accessible manner on paper or on some electronic device. They are also often stored on email accounts, cloud or shared drives stored online (such as Google Drive),

and other online storage mediums.

FACTS AND CIRCUMSTANCES REGARDING PROBABLE CAUSE

20. As set forth in detail below, Your Affiant believes that MATTHEW MULFORD, until the time of arrest, was a co-conspirator in the Dark Net Moniker 1⁴ Drug Trafficking Organization (DTO) under the moniker Dark Net Moniker 2.⁵ The Dark Net Moniker 1 DTO is primarily involved in the manufacture and sale of counterfeit Xanax. MULFORD's role in the Dark Net Moniker 1 DTO includes designing a dark web site (Dark Net Moniker 3)⁶ to facilitate the sale of counterfeit Xanax and other illegal narcotics, operating as the vendor Dark Net Moniker 3 on the dark web Dream Market account selling counterfeit Xanax and other illegal narcotics, and handling various logistical shipping and sales of narcotics for the Dark Net Moniker 1 DTO. MULFORD and K.E. (Mulford's live-in girlfriend, whose name is known to the Affiant) have Postal Service accounts registered with an email address that is also used to communicate with members of the Dark Net Moniker 1 DTO. Records from MULFORD's Cryptocurrency Exchange 1⁷ account identify bitcoin transactions used to facilitate the production of counterfeit Xanax in the Dark Net Moniker 1 DTO.

⁴ Your Affiant uses the term "Dark Net Moniker 1" rather than the actual dark net moniker (which is known to the Affiant) in order to avoid alerting the target using Dark Net Moniker 1 to the charge and arrest of his co-conspirator and thereby compromise the ongoing investigation. Your Affiant is aware that dark net targets research law enforcement action that may involve their organization and take obstructive actions as a result. For instance, after law enforcement arrested several of Dark Net Moniker 1's criminal co-conspirators earlier this year, the user of Dark Net Moniker 1 not only changed his operational security, but also posted the personal information of several law enforcement involved in the arrests onto the dark net.

Thus, in order to avoid compromising the ongoing investigation, your Affiant has anonymized some of the information contained in the affidavit.

To Affiant's present knowledge, there is only one user of Dark Net Moniker 1.

⁵ To Affiant's present knowledge, Dark Net Moniker 2 is a name that MULFORD has used on various platforms. He is the only known user of this moniker.

⁶ To Affiant's present knowledge, Dark Net Moniker 3 is a name that both MULFORD and the user of Dark Net Moniker 1 on various platforms.

⁷ The name of the cryptocurrency exchange is known to the Affiant.

21. On October 3, 2018, federal and local law enforcement executed a federal search warrant at MATTHEW MULFORD's residence. Upon entering the premises, law enforcement began a recorded, *Mirandized*, and voluntary interview of MATTHEW MULFORD. During the interview and thereafter, MULFORD admitted that he operates both the Dark Net Moniker 2 and Dark Net Moniker 3 monikers (including associated email accounts), that he is a co-conspirator with the user of Dark Net Moniker 1, that he operates the Dark Net Moniker 3 dark net market account, that he processes all drug customer orders and communicates with other members of the conspiracy to ensure that they are fulfilled, that he created the Dark Net Moniker 3 dark net website for future Dark Net Moniker 1 DTO direct sales, that he paid the re-shippers on a weekly basis, and that the user of Dark Net Moniker 1 paid him for his services. In the course of the interview, MULFORD provided investigating agents with information allowing them access to various accounts associated with Dark Net Monikers 2 and 3.

22. On March 26, 2018, Cleveland Postal Inspectors seized the parcels and searched them pursuant to federal search warrants. The drugs contained in the parcels were sent to the Cuyahoga County drug laboratory ("CC Lab") that confirmed the presence of illegal narcotics.

23. On March 26, 2018, U.S. Postal inspection Service-Cleveland Field Office, Homeland Security Investigations, and the Cleveland Police Department conducted a controlled delivery of 5078 Alprazolam pills to Source 1. Cleveland Postal Inspectors subsequently identified Source 1 who admitted to being a re-seller for several dark web counterfeit Xanax vendors. One of the vendors Source 1 sold for was Dark Net Moniker 1. Source 1 signed a consent form permitting law enforcement to access and assume his user name's online identity.

24. Cleveland Postal Inspectors are aware that Dark Net Moniker 1 is an organization that imports, manufactures, and distributes counterfeit Xanax on the dark web via U.S. Mail.

Based on evidence uncovered during the investigation, including a review of publicly available information on the dark web and various law enforcement databases, your Affiant is aware that Dark Net Moniker 1 has been operational since at least 2015 on various dark web market places. Dark Net Moniker 1 distributed counterfeit Xanax both domestically and internationally.

25. On April 9, 2018, law enforcement in multiple states conducted search warrants at the residences of two individuals who were producing and distributing counterfeit Xanax pills for Dark Net Moniker 1. These searches resulted in the seizure of Counterfeit Xanax, pill presses, and cryptocurrency. According to law enforcement, the head of Dark Net Moniker 1 DTO and the second in command of Dark Net Moniker 1 DTO were not arrested or identified during those searches. This is corroborated by the fact that the user of Dark Net Moniker 1 has continued to conduct dark web drug trafficking activity. Agents know the user of Dark Net Moniker 1 is in control of bitcoin wallets worth millions of dollars.

26. On April 13, 2018, law enforcement identified a post from Dark Net Moniker 1 on a dark web forum confirming the aforementioned arrests were connected to the Dark Net Moniker 1 organization. The posting by username Dark Net Moniker 1 listed several law enforcement officers' names who were involved in the investigation. Dark Net Moniker 1 stated "We are retiring the name, but not going away."

27. Cleveland Postal Inspectors subsequently reviewed Source 1's email related to his dark web account and identified communications from [Dark Net Moniker 1]*elude.com⁸. Given the communications between undercover agents and the account, law enforcement believes that the individual controlling email address [Dark Net Moniker 1]*elude.com is a high level operative

⁸ Throughout this affidavit, the "@" symbol in email addresses is replaced with an "*" to avoid anyone inadvertently clicking on an email address hyperlink and emailing a target of the investigation.

in the Dark Net Moniker 1 organization.

28. On or about April 14, 2018, Postal Inspectors initiated an undercover operation using the assumed Source 1 email (CLE UC).

29. On April 14, 2018, [Dark Net Moniker 1]_dd*secmail.pro emailed (CLE UC) “hello sir, due to the recent issues we have had some organization is in order and I would like to make you part of the new team, [the user of Dark Net Moniker 1] is on board as well. Reach out to me when you can”. On April 17, 2018, [Dark Net Moniker 1]_dd*secmail.pro emailed CLE UC “this email account will be terminated shortly, reach me at [Dark Net Moniker 2]*elude.in”.

30. On April 17, 2018, [Dark Net Moniker 1]*elude.in emailed CLE UC and stated “[Dark Net Moniker 1]_dd*secmail.pro is our DD/sales email”. Your Affiant is aware that “DD” is dark web slang referring to “direct deals” meaning sales that take place off of an established dark web marketplace. On April 18, 2018, [Dark Net Moniker 1]*elude.in emailed CLE UC and stated [Dark Net Moniker 1]_dd*secmail.pro is our “CS dude”. Your affiant believes “CS” stands for “Customer Service” and has similar connotations as “DD” and sales.

31. On April 18, 2018, [Dark Net Moniker 1]*elude.in emailed CLE UC and offered to import a pill press and Alprazolam into the United States and pay CLE UC .20 cents per counterfeit pill produced.

32. On May 11, 2018, [Dark Net Moniker 1]*elude.in emailed CLE UC stating the pill press has been ordered and is in the process of being manufactured.

33. On May 22, 2018, Jabber communication between CLE UC and MULFORD revealed the new [Dark Net Moniker 1] vendor account on Dream Market as “**Dark Net Moniker 3**”. CLE UC asked MULFORD (using Dark Net Moniker 2) if he received a promotion from Dark Net Moniker 1, referring to previous conversations regarding Dark Net Moniker 2’s role in the

Dark Net Moniker 1 organization. MULFORD replied “well...I am doing more. The onion [dark web marketplace] is almost done. About two week eta [until completion]”.⁹ From this and other conversations, Postal Inspectors are aware that MULFORD was referring to a new dark web marketplace being developed by him to facilitate the sale of counterfeit Xanax by the Dark Net Moniker 1 DTO.

34. On June 13, 2018, MULFORD (using Dark Net Moniker 2) stated in a Jabber message with CLE UC that MULFORD was responsible for sending alprazolam and supplies and also stated they (referring to the Dark Net Moniker 1 DTO) are reselling 750,000 bars per week. MULFORD noted that the Dark Net Moniker 1 DTO is forced to buy and resell these illegal narcotics because the press that was to be sent to CLE UC isn’t up and running.

35. June 24, 2018, Dark Net Moniker 2*protonmail.com emailed CLE UC, “I was working on our hidden site for a while. But going into use starting tonight”.

36. On June 27, 2018, [Dark Net Moniker 1]*jabber stated to CLE UC “[Dark Net Moniker 3] is our name. we’ve been selling alp powder and various bars we’ve come across.” Your Affiant is aware that the DTO changed the “brand name” to Dark Net Moniker 3 due to previous law enforcement activity, mentioned above.

37. On June 30, 2018, MULFORD (using Dark Net Moniker 2) jabber provided CLE UC with directions to access the “Dark Net Moniker 3” direct sales site onion address MULFORD created. CLE UC accessed the site and noted that it advertised counterfeit Xanax for sale.

38. On June 2, 2018, [Dark Net Moniker 1]*elude.in advised CLE UC to email him¹⁰

⁹ Where appropriate herein, Your Affiant has inserted words in brackets “[]” to define slang and code words used by those involved in the Dark Net Moniker 1 conspiracy.

¹⁰ For the sake of brevity and clarity, Your Affiant uses male pronouns herein to refer to individuals he is communicating with on the dark web. Your Affiant is aware that multiple individuals can share one email account and Your Affiant does not know whether of the individuals he is communicating with are male or female. Similarly, Your Affiant refers to undercover agents and investigators herein with male pronouns whether male or female.

at [Dark Net Moniker 1]*protonmail.com.

39. On June 19, 2018, CLE UC received an email from [Dark Net Moniker 1]*protonmail.com advising the pill press was sent and provided the following tracking numbers:

DHL #1633823026 addressed to 44111 Zip Code sent from China

DHL #1633777235 addressed to 44111 Zip Code Sent from China

USPS #EA331734835CN – Sent from China

40. On June 21, 2018, DHL #1633823026 and DHL #1633777235 were delivered and recovered by Postal Inspectors. DHL #1633823026 was manifested as “The operating table of molding machine” and DHL #1633777235 was manifested as “The Main workable of welding machine”. The actual contents were two separate parts forming a 7P9B Rotary pill press. According to clear web searches the 7P9B is capable of producing 16,200 pills per hour.

41. On June 21, 2018, [Dark Net Moniker 1]*protonmail.com offered to reimburse CLE UC for expenses incurred in setting up the pill press. On June 22, 2018, [Dark Net Moniker 1]*protonmail.com deposited approximately \$1,000 into a bitcoin wallet provided by CLE UC.

42. As of June 25, 2018, [Dark Net Moniker 1]*protonmail.com arranged for the shipment and provided tracking numbers to CLE UC for the following delivered counterfeit Xanax precursors:

100 KG of Microcrystalline Cellulose

10 KG of Sodium Stearyl Fumarate

30 KG of Silicone Dioxide

25 KG of Copovidone

10KG of Croscarmellose Sodium

2.5 KG of Yellow Dye

43. On June 26, 2018, [Dark Net Moniker 1]*protonmail.com sent CLE UC USPS tracking number #92055901755477000083784741. On June 28, 2018, CLE UC received parcel #4741 bearing return address Miles Silvas Apt 308, 11103 SW Davies Rd. Beaverton, OR 97007. The parcel contained approximately 266.5 grams of a white powdery substance sent from Beaverton, OR 97007. [Dark Net Moniker 1]*protonmail.com subsequently advised CLE UC the substance is Flualprazolam, and stated it had the same effect as Alprazolam. [Dark Net Moniker 1]*protonmail.com emailed CLE UC the formula to make counterfeit Xanax. On July 19, 2018, lab results confirmed the substance as 266.5 grams of Flualprazolam.

44. On August 13, 2018, MULFORD (using [Dark Net Moniker 2]*protonmail.com) emailed CLE UC “Just wanting to check in since the word is you are close on getting hulk’s down. Just curious a about ETA and photos you might have thus far. No judgement I promise !! Haha Hope all is well”. CLE UC replied and advised he was producing hulks.¹¹ [Dark Net Moniker 2]*protonmail.com then emailed CLE UC “glad to hear it my friend. Eta on when it will be in the shippers hands?” CLE UC replied he would be done pressing by Wednesday. [Dark Net Moniker 2]*protonmail.com then emailed CLE UC “sounds fucking fantastic! Thank you for all your hard work. Its time to get paid!”

45. On August 13, 2018, [Dark Net Moniker 1]*protonmail.com emailed CLE UC “Hey man what’s going on?? You said you were close 4 days ago. Can we get an update?” CLE UC sent a picture of counterfeit Xanax hulks in a bucket and advised he will continue to fill the bucket with hulks, will be out of flualprazolam by Wednesday, and will send them all out.

46. On August 14, 2018, CLE UC advised [Dark Net Moniker 1]*protonmail.com that

¹¹ “Hulks” are counterfeit Xanax

he produced a bucket full of counterfeit Xanax hulks and sent an attachment of a half filled bucket of green pills. The pictured pills had the size, shape, color and appearance of actual Xanax, including the identifier S 90 3 on each pill. [Dark Net Moniker 1]*protonmail.com replied by email to CLE UC as follows:

“So I'm gonna give you orders to start shipping out like 30-50k packs to our shippers! Are you ready for that, do you have all the necessary packaging and stuff all set? Remember to not skimp on bubble wrap and to vac seal everything! Otherwise the shipment will arrive full of broken bars. Also making them nice and hard is important for making sure they don't break in shipping. Any questions let me know. Anyway here's your first shipment” and then provided a series of addresses. Law enforcement subsequently performed a series of controlled deliveries based on the information that the user of Dark Net Moniker 1 provided.

47. On August 15, 2018, CLE UC conducted an undercover purchase of 1 gram of Diazepam from Dark Net Moniker 3 on the Dream Market. On August 21, 2018, CLE UC received USPS Parcel # 92055901755477000094093870 containing 2.19 grams of Diazepam (Cuyahoga County Lab #2018-006834-0002).

48. On August 20, 2018, the Dark Net Moniker 3 Dream Market account stated “Hulks are listed” under Dark Net Moniker 3’s profile. From contemporaneous conversations, CLE UC believes the Hulks listed for sale are the counterfeit green Xanax CLE UC advised [Dark Net Moniker 1]*protonmail.com and MULFORD (using [Dark Net Moniker 2]*protonmail.com) he had produced. As of August 20, 2018, Dark Net Moniker 3 Dream Market account listed 440 sales.

49. On August 23, 2018, Postal Inspectors in California, Georgia, Pennsylvania, and Oregon conducted controlled deliveries of the parcels sent by Postal Inspectors in Cleveland that

were intended to contain 100,000 “Hulks” (counterfeit Xanax) pills as directed by [Dark Net Moniker 1]*protonmail.com.

50. On August 23, 2018, [Dark Net Moniker 2]*protonmail.com emailed CLE UC “Pack was sized by DHS. Only one I know about right now. Still waiting to hear from the second”.

51. On August 24, 2018, the Dark Net Moniker 3 Dream Market account changed its status to “Vacation” and removed all listings of drugs for sale.

52. Through further communication [Dark Net Moniker 1]*protonmail.com, CLE UC was able to convince [Dark Net Moniker 1]*protonmail.com that the parcels seized by law enforcement were simply profiled and CLE UC was not compromised by law enforcement. From September 1 through September 6, 2018, [Dark Net Moniker 1]*protonmail.com emailed CLE UC requesting two test parcels be sent out to see if police intercept them.

53. On September 1, 2018, MULFORD (using Dark Net Moniker 2*protonmail.com) responded to CLE UC by emailing the following “i'll make myself available today. and no one from the previous group of people is around except for me and [Dark Net Moniker 1], and everything is different now so that seems very unlikely”.

54. On September 10, 2018, [Dark Net Moniker 1]*protonmail.com emailed CLE UC the following two addresses to send test packs and requested 20,000 counterfeit Xanax to be sent if the test packs get through.

55. [Dark Net Moniker 1]*protonmail.com requested a bitcoin wallet from CLE UC to deposit \$500 for sending the test parcels. On September 10, 2018, CLE UC received .07862 BTC (approximately \$500).

56. On September 13, 2018, [Dark Net Moniker 1]*protonmail.com emailed CLE UC

and advised the Illinois test parcel was delivered and to send 40,000 pills to an address.

57. With the 400 grams of Flurazepam [Dark Net Moniker 1] already sent CLE UC and the 2 kilograms of Alprazolam [Dark Net Moniker 1]*protonmail.com is currently sending, CLE UC could produce approximately 960,000 counterfeit Xanax (2.5 mg pills). These pills would be distributed through the mail by the members of the Dark Net Moniker 1 organization.

58. As of September 18, 2018, the Dark Net Moniker 3 Dream Market account lists 520 completed sales since April 26, 2018, and currently lists the following items for sale:

- 500mg to 10mg Etizolam
- 25 to 250 S903 Xanax Bars
- 25 to 250 GG249 Xanax Bars

MATTHEW MULFORD/DARK NET MONIKER 2

59. A review of Postal Service records identified email address Dark Net Moniker 2*protonmail.com as having been registered on September 23, 2017, in Postal Service databases and associated with the name K.E., MATTHEW MULFORD's address. As set forth above, CLE UC email communications with Dark Net Moniker 2*protonmail.com and Dark Net Moniker 2 on Jabber revealed the individuals behind this email and Jabber moniker were responsible for creating the dark web counterfeit Xanax sales site Dark Net Moniker 3.

60. K.E. is the girlfriend of MATTHEW MULFORD and describes herself on LinkedIn as a "Design Assistant with duties of website design at Spectral Sounds LLC". According to Florida Divisions of Corporations, MATTHEW MULFORD is the "Title Mgr" for Spectral Sounds LLC, and lists MULFORD's address as the address of Spectral Sounds LLC.

61. Postal Service databases identify MATTHEW MULFORD associated with the

following email accounts: Mattm1916*Hotmail.com, mr.mulford@gmail.com, matt.mulford@protonmail.com and mr.mulford0@gmail.com. Postal Service databases also associate email address mr.mulford0@gmail.com to MULFORD's address and two other addresses in Panama City, Florida.

62. On September 13, 2018, MULFORD (using Dark Net Moniker 2@protonmail.com) emailed CLE UC and told CLE UC to contact him at [Dark Net Moniker 2]@countermail.com.

63. A review of Cryptocurrency Exchange 1 records by Cleveland Postal Inspectors identified a Cryptocurrency Exchange 1 bitcoin account associated with MATTHEW MULFORD had sent approximately 2.4 bitcoins (Approx. \$14,731 USD) in June 2018 to an individual who was responsible for shipping various chemicals to CLE UC for the production of counterfeit Xanax.

MATTHEW MULFORD HISTORICAL CRIMINAL ACTIVITY

64. On January 10, 2017, Panama City Police Department executed a search warrant on MATTHEW MULFORD's previous residence, 1217 Frankford Ave, Apt B, Panama City, Florida, resulting in the recovery of various narcotics, including alprazolam pills. MULFORD was interviewed by Panama City Police and stated he uses Bitcoins to purchase illegal narcotics from unknown sources over the internet and receives them at his home address via the U.S. Postal Service. Panama City Police seized MULFORD's Samsung Galaxy S7 cellular telephone SN#358512070414349 and Apple MacBook Pro Model #A1278 Serial No: CPWLR9SGDTY3. MULFORD refused to provide his passwords to access the devices. MULFORD was subsequently charged in Bay County, Florida, in case number 17000104CFMA with Possession of Controlled Substance With Intent to Distribute, Possession of LSD with Intent to Sell or Deliver, Possession of more than 20 grams of marijuana, and Possession of Paraphernalia. On March 2, 2017,

MULFORD entered a guilty plea to two counts of possession of drug paraphernalia and was sentenced to 60 months probation. Adjudication on the remaining counts was held in abeyance.

OCTOBER 3, 2018 SEARCH

65. On October 3, 2018, federal and local law enforcement executed a federal search warrant at MATTHEW MULFORD's residence. Upon entering the premises, law enforcement began a recorded, *Mirandized*, and voluntary interview of MATTHEW MULFORD. During the interview and thereafter, MULFORD admitted that he operates both the Dark Net Moniker 2 and Dark Net Moniker 3 monikers (including associated email accounts), that he is a co-conspirator with the user of Dark Net Moniker 1, that he operates the Dark Net Moniker 3 dark net market account, that he processes all drug customer orders and communicates with other members of the conspiracy to ensure that they are fulfilled, that he created the Dark Net Moniker 3 dark net website for future Dark Net Moniker 1 DTO direct sales, and that the user of Dark Net Moniker 1 paid him for his services.

66. The search and interview are ongoing at the time of the complaint signing.

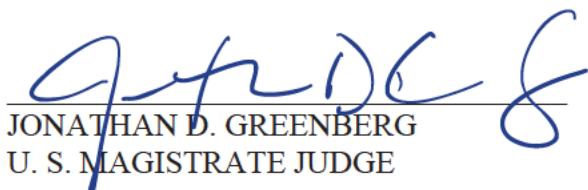
CONCLUSION

67. For the foregoing reasons, Affiant respectfully submits that there is probable cause that MATTHEW MULFORD, a.k.a. "Dark Net Moniker 2" and "Dark Net Moniker 3," committed the following federal offenses: Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances and Controlled Substance Analogues, in violation of 21 U.S.C. § 846, and Conspiracy to Launder Money, in violation of 18 U.S.C. § 1956(h).



Bryon Green
Postal Inspector

SUBSCRIBED AND SWORN TO ME THIS 3rd DAY OF OCTOBER, 2018 VIA
TELEPHONE AFTER SUBMISSION BY
RELIABLE ELECTRONIC MEANS. FED. R. CRIM. P. 4.1; 41(D)(3).


JONATHAN D. GREENBERG
U. S. MAGISTRATE JUDGE

